

COMPLIANCE WITH MULTIPLE OWNERSHIP RULES

Galaxy Syracuse Licensee LLC (“Galaxy Syracuse”) is the current licensee of the following (grandfathered) 8 stations (5 FM, 3 AM) in the Syracuse, New York Arbitron Radio Market:

WKRH(FM)	Facility ID 56996	Minetto, New York
WKRL-FM	Facility ID 54547	North Syracuse, New York
WSCP(AM)	Facility ID 1046	Sandy Creek-Pulaski, New York
WSGO(AM)	Facility ID 24130	Oswego, New York
WTKV(FM)	Facility ID 24131	Oswego, New York
WTKW(FM)	Facility ID 22234	Bridgeport, New York
WTLA(AM)	Facility ID 54546	North Syracuse, New York
WZUN(FM)	Facility ID 60253	Phoenix, New York

On June 25, 2013, Galaxy Syracuse filed two assignment applications with the Commission. The first application requests consent to assign the license of Station WZUN(FM) to an independent party, WZUN Communications LLC (“WZUN”). *See* FCC File No. BALH- 20130625ABJ. The second application requests consent to assign the licenses of the other seven stations to a new Delaware limited liability company, Galaxy Syracuse LLC (“New Galaxy Syracuse”). *See* FCC File No. BALH- 20130625ABN. The WZUN and New Galaxy Syracuse assignments will be consummated simultaneously. Galaxy Syracuse acknowledges that the instant minor modification application cannot be granted until the transactions underlying the assignment applications are consummated, but respectfully requests that this application be processed concurrently with the assignment applications.

After completion of the sale of Station WZUN(FM), and implementation of the community of license changes proposed in the instant application and the contingently related application to modify the facilities of Station WTKV(FM), New Galaxy Syracuse would be licensee of the following 6 stations (3 FM, 3 AM) licensed to communities that are located in the Syracuse market:

WKRL-FM	Facility ID 54547	North Syracuse, New York
WSCP(AM)	Facility ID 1046	Sandy Creek-Pulaski, New York
WSGO(AM)	Facility ID 24130	Oswego, New York
WTKV(FM)	Facility ID 24131	Minetto, New York
WTKW(FM)	Facility ID 22234	Bridgeport, New York
WTLA(AM)	Facility ID 54546	North Syracuse, New York

Because there are 43 full power commercial and noncommercial radio broadcast stations that serve the Syracuse, New York market, a person or entity may have a

cognizable interest in no more than seven radio stations, with no more than four stations in the same service, in that market.¹ Galaxy will be in full compliance with the Commission's multiple ownership rules in the Syracuse market.

The instant application proposes to change the community of license of WKRH(FM) to Fair Haven, New York. Fair Haven is located in Cayuga County, New York, which is not included in any Arbitron metro area. Therefore, in accordance with the Commission's requirements,² a contour overlap study was prepared and is attached to this exhibit. This study demonstrates that, following the proposed modification of Station WKRH(FM), New Galaxy Syracuse will be in compliance with the multiple ownership rules.

¹ See 47 C.F.R. § 73.3555(a)(1)(ii); *see also* Exhibit 15 to the contingent WTKV(FM) application.

² See *In re 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13620, 13730 (2003).

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
GALAXY SYRACUSE LICENSEE LLC

This radio multiple ownership analysis was prepared on behalf of Galaxy Syracuse Licensee LLC (herein “Galaxy”). Galaxy proposes in contingent construction permit applications to (1) change the city of license of WKRH(FM) from Minetto, New York to Fair Haven, New York and to also change its transmitter site location and (2) change the city of license of WTKV(FM) from Oswego, New York to Minetto, New York. Therefore, a review of the stations that Galaxy has an interest was completed. Specifically, the following stations are considered under ownership or control:

Call Sign / Facility ID	Location	Facilities
WKRH(FM)/56996 <i>Proposed Facility</i>	Fair Haven, NY	CH 293A 5.4 kW 100 M
WTKV(FM)/24131 <i>Proposed Facility</i>	Minetto, NY	CH 288A 4 kW 121 M
WSCP(AM)/1046 <i>BL-19790814AD</i>	Sandy Creek-Pulaski, NY	1070 kHz 2.5 kW ND-D
WSGO(AM)/24130 <i>BL-19890629AB</i>	Oswego, NY	1440 kHz, 1 kW-D/0.045 kW-N U
WTLA(AM)/54546 <i>BL-19910604AB</i>	North Syracuse, NY	1200 kHz 1 kW-U DA-N
WKRL-FM/54547 <i>BLH-19911016KC</i>	North Syracuse, NY	CH 265A 6 kW 50 M
WTKW(FM)/22234 <i>BLH-20070319ACA</i>	Bridgeport, NY	CH 258A 5.7 kW 103 M

The principal community contours (3.16 mV/m for FM stations, 5 mV/m for AM stations) of the stations are depicted on a map included herein as Figure 1.* Since some of these stations have overlapping principal community contours, an ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

* Only those stations involved in contour overlap with the proposed WKRH(FM) operation have been shown on Figure 1.

Radio Market

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned.[†] There is one “radio market” defined for analysis under the Commission’s Rules created by the proposed WKRH(FM) facility modification. The table below lists the defined market:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
Market 1	WSCP(AM)/WSGO(AM)	WKRH(FM)/WTKV(FM)

Count of Stations in Defined Market

The number of other radio stations in a “radio market” is determined by counting the operating stations having principal community contours that intersect the principal community contours which define the radio market, plus the subject stations that are co-owned. Only those stations located within 92 kilometers of the perimeter of the mutual overlap area of the respective defined market area were employed in the count of the stations. Commonly controlled stations were not considered in the count of stations in the defined markets. The results of the analysis are tabulated below:

Defined Radio Market	Minimum Number of Other Stations in Radio Market
Market 1	6 AM, 13 FM; 18 Total

Figure 2 is a tabulation of the radio stations identified in the defined radio markets tabulated above. It is noted that the tabulation is not a complete list of all of the other stations in the market, but rather enough stations to show compliance with the FCC’s radio multiple ownership rules. Only known licensed, operating stations were employed for the study.

Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus Distance Graph of 47 CFR 73.184. Ground conductivity data

[†] See Order in Implementation of Section 202(a) and 202(b)(1) of the Telecommunications Act of 1996 (Broadcast Radio Ownership) FCC 96-90, released March 8, 1996 and Memorandum Opinion and Order in Revision of Radio Rules and Policies 7 FCC Rcd 6387, 6395 para. 39 (1992).

were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method of 47 CFR 73.313. Terrain data was derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

Based on the above, it is concluded that the applicant will be in compliance with the Section 73.3555(a) of the FCC Rules using the interim contour method.

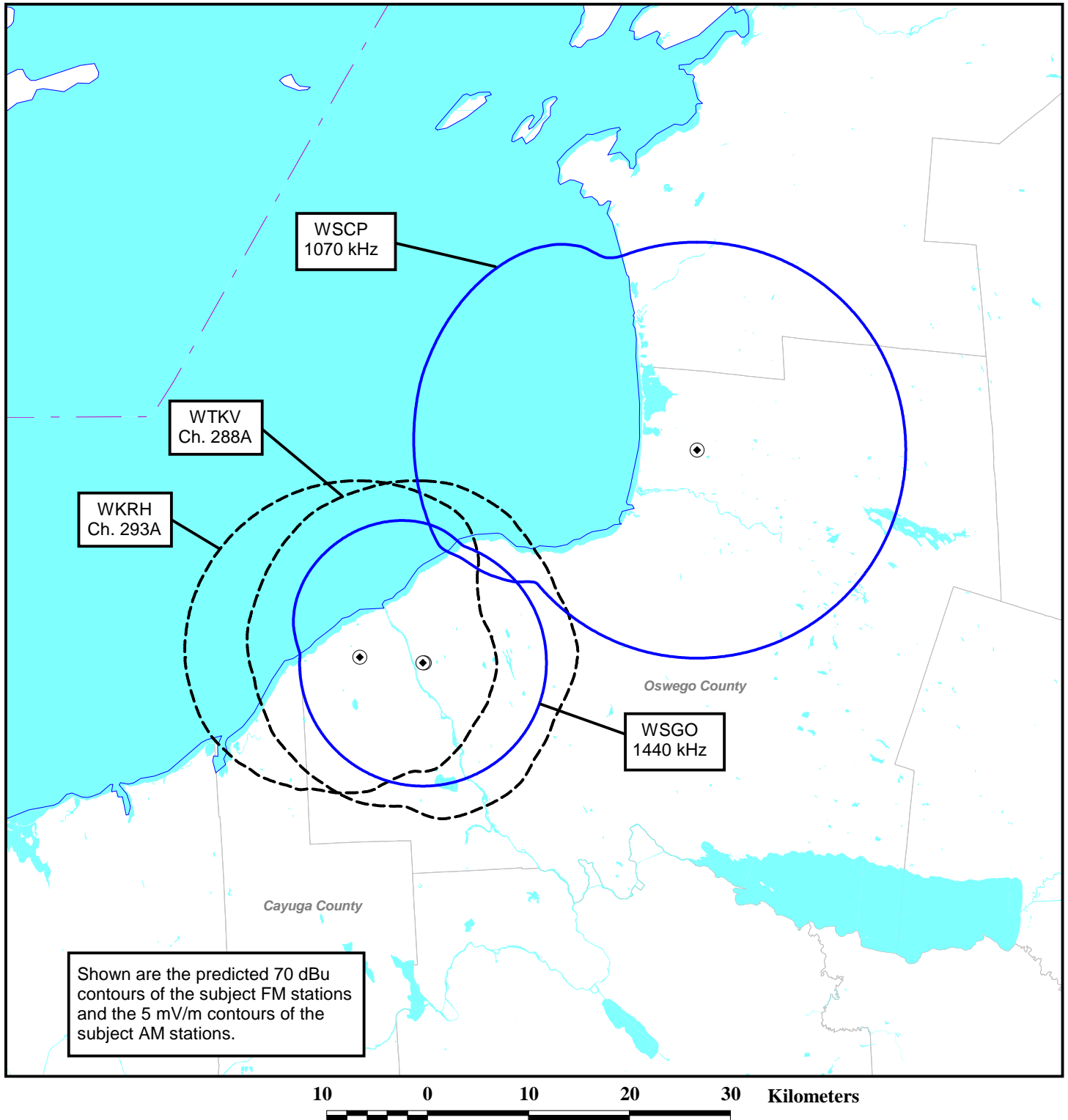


W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.
201 Fletcher Ave.
Sarasota, Florida 34237
(941)329-6000

July 5, 2013

Figure 1



PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

du Treil, Lundin & Rackley, Inc. Sarasota, Florida 34237

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS

Tabulation of Other Stations Defined in the Radio Market

<u>AM Stations</u>			
<u>Call Sign</u>	<u>Community of License</u>	<u>State</u>	<u>Frequency</u>
WOSW	Fulton	NY	1300 kHz
WHEN	Syracuse	NY	620
WTNY	Watertown	NY	790
WSYR	Syracuse	NY	570
<u>FM Stations</u>			<u>Channel</u>
WGKV	Pulaski	NY	269A
WWLF-FM	Oswego	NY	244A
WSEN-FM	Baldwinsville	NY	221B1
WEFX	Henderson	NY	264A
WYYY	Syracuse	NY	233B
WBBS	Fulton	NY	284B
WNTQ	Syracuse	NY	226B
WWHT	Syracuse	NY	300B
WRVO	Oswego	NY	210B
WNYO	Oswego	NY	205A
WVOA-FM	Mexico	NY	280A